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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RICHARD GIBSON, and HERIBERTO
VALIENTE,

Plaintiffs,

v.

MGM RESORTS INTERNATIONAL,
CENDYN GROUP, LLC, THE RAINMAKER
GROUP UNLIMITED, INC., CAESARS
ENTERTAINMENT INC., TREASURE
ISLAND, LLC, WYNN RESORTS HOLDINGS,
LLC,

Defendants.

Case No. 2:23-cv-00140-MMD-DJA

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
FILE THE PROPOSED DISCOVERY
PLAN**

(FIRST REQUEST)

STIPULATION

Plaintiffs Richard Gibson and Heriberto Valiente (“Plaintiffs”) and Defendants Cendyn Group, LLC (“Cendyn”), the Rainmaker Group Unlimited, Inc. (“Rainmaker”), Caesars Entertainment, Inc. (“Caesars”), Treasure Island, LLC (“Treasure Island”), and Wynn Resorts Holdings, LLC (“Wynn”) (together, “Defendants”) (collectively, Plaintiffs and Defendants are referred to herein as the “Parties”), by and through their respective counsel, for good cause shown, hereby stipulate and agree to extend the Parties’ deadline to negotiate a proposed ESI Order and a proposed Protective Order.¹

1. The Parties filed their Proposed Discovery Plan and Scheduling Order on May 15, 2023. *See* ECF No. 111. While the Plan has not yet been entered, it reflects that Plaintiffs and Defendants (except MGM) had aimed to negotiate a proposed ESI Order and a proposed Protective Order by June 30, 2023. *See* ECF No. 111 at pp. 5, 7, 12-14, and 24.

2. Negotiations are ongoing. This Stipulation has been entered into because the Parties have determined that they need additional time to continue the meet and confer process to prepare a proposed ESI Order and a proposed Protective Order.

Accordingly, the Parties now hereby stipulate and agree, and respectfully request that the Court order, as follows:

1. The deadline for the Parties to file a proposed ESI order and a proposed Protective Order is extended to and including **July 20, 2023**.

2. This stipulation is filed in good faith and not intended to cause delay, but rather, to provide the Parties with sufficient time to work through various issues related to an ESI Order and Protective Order in this multi-party class action.

3. Nothing in this stipulation is intended in any way to waive or affect the rights, claims, defenses, objections, or arguments that any party may have with respect to any matter, other than those expressly addressed and agreed herein.

¹ MGM Resorts International (“MGM”) believes that all discovery as to it should be stayed pending resolution of its separate motion to dismiss.

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ORDER

IT IS SO ORDERED:

DATED: June __, 2023

UNITED STATES MAGISTRATE JUDGE

DATED: June 30, 2023

Respectfully submitted,

/s/ Rahul Ravipudi

/s/ Steve W. Berman

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO FILE THE PROPOSED DISCOVERY PLAN** was served on the 30th of June, 2023 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Mark Holscher

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